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July 28, 2021

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) is currently at liberty on a bond that contains numerous conditions including electronic monitoring. On August 4, 2021, Hlday is scheduled to undergo a surgical procedure that requires removal of his location monitoring bracelet. Documentation regarding this procedure has been provided to the government and Pretrial Services (“Pretrial”). Similar to the process that has taken place in the past, Pretrial has advised me that upon permission of the Court, Hlday can make arrangements with Pretrial in his supervising district for the removal and prompt reattachment of the device. Accordingly, defendant respectfully requests that the Court permit removal of the bracelet on August 4, 2021 as directed by Pretrial. The government, by Assistant United States Attorney Mark Bini, and Pretrial, by United States Pretrial Officer, Ramel Moore, consent to this application.

Thank you for Your Honor’s consideration of this request.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Sarah Evans (by ECF)
AUSA Mark Bini (by ECF)
USPTO Ramel Moore (by email)